

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**U.S. SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**vs.**

**KIK INTERACTIVE INC.**

**Defendant.**

**Case No. 19-cv-5244 (AKH)**

**SECOND DECLARATION OF LAURA D'ALLAIRD**

I, Laura D'Allaird, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a member of the bar of the State of New York, and I am admitted to practice *pro hac vice* in the above-captioned action. I am employed by Plaintiff United States Securities and Exchange Commission (the "SEC") in the SEC's headquarters office in Washington, D.C. as Senior Counsel in the Division of Enforcement.

2. I have personal knowledge of the facts and circumstances of this case. As counsel representing the SEC, I reviewed information and documents obtained by the SEC during its investigation and litigation of this matter, including documents described herein, and information provided to me by members of the SEC staff.

3. I am submitting this Declaration to put forth exhibits in support of the SEC's Motion for Summary Judgment and Memorandum in Opposition to Defendant Kik Interactive Inc.'s Motion for Summary Judgment.

4. Attached hereto are true and correct copies of the following documents:

<u>Exhibit</u>	<u>Document Description</u>	<u>Bates</u>
SEC104	Second Declaration of Brent Mitchell, dated April 22, 2020	N/A
SEC105	Email, dated August 21, 2017	KIK_00066759
SEC106	Email, dated September 13, 2017	KIK_00061820-21
SEC107	Letter from Robert A. Schwartz to The Honorable P. Kevin Castel, dated February 18, 2020, in <i>SEC v. Telegram Group Inc.</i> , No. 19 Civ. 9439 (PKC) (S.D.N.Y.) (ECF No. 203)	N/A
SEC108	Hearing Transcript in <i>SEC v. Telegram Group Inc.</i> , No. 19 Civ. 9439 (PKC) (S.D.N.Y.), dated February 19, 2020	N/A

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Washington, D.C.  
April 24, 2020

/s/Laura D'Allaird  
Laura D'Allaird

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2020, I caused the foregoing to be filed using the Court's CM/ECF system, which will send a notification of such filing to each counsel of record.

/s/Laura D'Allaird

Laura D'Allaird  
*Counsel for Plaintiff*